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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE GOOGLE PLAY STORE ANTITRUST
LITIGATION

THIS DOCUMENT RELATES TO:

State of Utah, et al. v. Google LLC, et al.,
Case No. 3:21-cv-05227-JD

Case No. 3:21-md-02981-JD

**DECLARATION OF ERIC SCHACHTER
REGARDING UPDATES TO PROPOSED
PARENS PATRIAE CONSUMER NOTICE**

Judge: Hon. James Donato
Courtroom: 11, 19th Floor
Date: February 26, 2024, at 1:30 p.m.

1 I, Eric Schachter, declare as follows:

2 1. I am a Senior Vice President with A.B. Data, Ltd. (“A.B. Data”). I am fully familiar
3 with the facts contained herein based upon my personal knowledge, and if called as a witness,
4 could and would testify competently thereto. I submit this Declaration at the request of State
5 Plaintiffs’ Counsel in connection with the above-captioned action (the “Action”).

6 2. After submission of initial versions of the proposed notices to the Court on
7 December 18, 2023, A.B. Data has continued to analyze and review the proposed notice process,
8 including the draft notices attached as Exhibits A and B to my previous declaration,¹ in order to
9 provide the best practicable notice under the circumstances to Eligible Consumers.

10 3. A.B. Data has identified several references to “claim” or “claim form” in the initial
11 versions of the notices that may cause consumer confusion because the distribution plan will not
12 involve the use of a claims form for the majority of consumers.

13 4. For any consumers who have concerns about automatically receiving their payment
14 due to outdated contact information or other circumstances, I understand from State Plaintiffs’
15 Counsel that there will be a supplemental claims process after the automatic payments process is
16 complete. To facilitate a notification process for affected consumers who may not receive an
17 automatic payment, A.B. Data will include a form on the notice website that allows consumers to
18 enter their contact information to be notified when this supplemental claims process starts.

19 5. A.B. Data has identified several references to a “Claims Administrator” in the initial
20 version of the Long-Form Notice that should have been references to a “Notice Administrator.”

21 6. Attached hereto as Exhibit A is a true and correct copy of an updated Long-Form
22 Notice that resolves the above deficiencies and provides additional clarity.

23 7. Attached hereto as Exhibit B is a redline comparing the updated Long-Form Notice
24 in Exhibit A to the initial version of the Long-Form Notice submitted on December 18, 2023.

25 8. Attached hereto as Exhibit C is a true and correct copy of an updated Summary
26

27 ¹ Declaration of Eric Schachter in Support of States’ Unopposed Motion to Give Notice of Proposed *Parens*
28 *Patriae* Settlement, Document No. 522-4, filed December 18, 2023.

1 Notice that resolves the above deficiencies and provides additional clarity.

2 9. Attached hereto as Exhibit D is a redline comparing the updated Summary Notice in
3 Exhibit C to the initial version of the Summary Notice submitted on December 18, 2023.

4 I declare under penalty of perjury under the laws of the United States of America that the
5 foregoing is true and correct.

6 Executed this 16th day of February 2024.

7
8 DATED: February 16, 2024

9 By: 

Eric Schachter
A.B. Data, Ltd.
Milwaukee, Wisconsin